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November 18, 2002

**EX PARTE**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest  
Communications International Inc. for  
Authorization to Provide In-Region, InterLATA  
Service in the States of Colorado, Idaho, Iowa,  
Montana, Nebraska, North Dakota, Utah,  
Washington and Wyoming**

Dear Ms. Dortch:

In response to a request from Commission staff, Qwest Communications International Inc. (“Qwest”) submits this filing to demonstrate further that it manually processes service orders accurately.

Qwest already has provided a substantial amount of information in this proceeding demonstrating that it accurately provisions LSRs that are manually handled. We will not repeat that information here, except to point out that all of the evidence submitted consistently points to accuracy levels of over 90%, and usually over 95%. This evidence should overcome any doubts raised as to Qwest’s ability to manually process orders accurately. Nevertheless, in response to a request from Commission staff, Qwest submits this filing to demonstrate that the results of AT&T’s UNE-P trial in Minnesota also support a finding of compliance in this area.

The results of the UNE-P trial that AT&T conducted in Minnesota demonstrate (under AT&T’s own calculations) that Qwest provisions manually-handled orders with accuracy rates above 95%. Although AT&T conducted this trial only in Minnesota, the results regarding order accuracy apply across Qwest’s region because Qwest’s Interconnect Service Centers (“ISCs”), which Qwest used to process the UNE-P LSRs in the Minnesota trial, operate on a regional basis. To the extent LSRs need to be

manually processed, they are centrally processed by the same personnel, in the same ISC, using the same systems and processes, regardless of the state.

During the AT&T Minnesota UNE-P trial, AT&T's own measure of order accuracy showed that Qwest had a very low rate of manual handling errors. As explained more fully below, this is reflected in the transcripts of the Minnesota Section 271 proceeding, as well as in exhibits to AT&T's own OSS witness, John Finnegan. Attachment A of this filing contains the transcript from the relevant day of the Minnesota Section 271 proceeding. Attachments B and C are exhibits that were appended to Mr. Finnegan's testimony in Minnesota; they contain the results of Phase I and II of AT&T's Minnesota UNE-P test, respectively.

AT&T measured whether Qwest accurately provisioned orders through its own designated performance measure, "AT&T-MN-PR-7."<sup>1</sup> During the Minnesota UNE-P trial, AT&T submitted thousands of LSRs for UNE-P and verified that Qwest provisioned exactly what it had ordered on the LSR, including the features on the LSR.<sup>2</sup> AT&T even made test calls to determine if the order was provisioned correctly, including whether all of the features ordered were accurately provisioned.<sup>3</sup> AT&T calculated the percentage of time that Qwest provisioned exactly what had been ordered and reported the result as AT&T-MN-PR-7. AT&T unilaterally assigned a 95% benchmark for this measure.<sup>4</sup>

AT&T submitted 4,243 LSRs for UNE-P during Phase I of the test.<sup>5</sup> For Phase I, Qwest's accuracy rate was 97.81%, as reported by AT&T.<sup>6</sup> Even if all LSRs that were not provisioned correctly are attributed to manual order processing errors, Qwest's result was 96.93% (3.07% error rate) for Phase I – still well above AT&T's unilaterally-assigned 95% benchmark.<sup>7</sup>

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<sup>1</sup> See Attachment B at line 40; Attachment C at line 40.

<sup>2</sup> See Attachment A, Tr. 10/3/02 (Finnegan) at 134-35.

<sup>3</sup> See *id.*

<sup>4</sup> See *id.* at 135.

<sup>5</sup> See *id.* at 138.

<sup>6</sup> See Attachment B at line 40; Attachment A at Tr. 10/3/02 (Finnegan) at 135.

<sup>7</sup> See Attachment A, Tr. 10/3/02 (Finnegan) at 141.

During Phase II of the test, AT&T submitted 1,597 LSRs.<sup>8</sup> During Phase II, Qwest's accuracy rate, as reported by AT&T, was 99.49%.<sup>9</sup> Again, even if all LSRs that were not provisioned correctly are attributed to manual order processing errors, Qwest's result was 98.46% (1.54% error rate) for Phase II – still well above AT&T's unilaterally-assigned 95% benchmark.<sup>10</sup>

If there ever was any doubt about Qwest's ability to manually process orders accurately, the result of AT&T's UNE-P trial in Minnesota should put those doubts to rest. AT&T unilaterally determined that a 95% accuracy rate was acceptable for its needs, and then applied that standard across thousands of LSRs. In doing so, AT&T calculated that Qwest accurately processes orders between 96.93% and 99.49% of the time, depending on the nature of the orders. In short, AT&T's own evidence of Qwest's capabilities support a finding of compliance in this area.

The twenty-page limit does not apply to this filing.

Respectfully submitted,

*Hance Hance*

cc: E. Yockus J. Jewel J. Stanley  
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<sup>8</sup> See *id.*

<sup>9</sup> See Attachment C at line 40; Attachment A, Tr. 10/3/02 (Finnegan) at 136.

<sup>10</sup> See Attachment A, Tr. 10/3/02 (Finnegan) at 142.